

## Strategic Environmental Assessment (SEA) and Sustainability Appraisal

Accompanying the Regulation 19 Submission Version of the Castle Point Plan

### **NON-TECHNICAL SUMMARY**

**July 2025** 



# Non Technical Summary

#### 1 Introduction

This is a non-technical summary of the Strategic Environmental Assessment/ Sustainability Appraisal (SEA SA) that Castle Point Borough Council has undertaken alongside their emerging Castle Point Plan (referred to as the Plan hereafter) for the Borough.

#### 2 The Castle Point Plan

- The Plan will guide the pattern of development establish land use policies for the period for which Public Consultation on the Pre-Submission Plan (Regulation 19) will take place in 2025. The Plan will outline how Castle Point Borough Council will manage the borough's growth and development needs for the period 2026 to 2043. It will set out policies that will ensure development proposals contribute positively to achieving the Plan's overarching vision.
- 3 The Plan comprises a full suite of strategic policies, allocation policies and development management policies. It sets out a

- clear vision and objectives for the borough's future growth and development, along with policies that guide the sustainable distribution of development across Castle Point.
- 4 The timetable for Castle Point's emerging Plan is set out in the Local Development Scheme, with final adoption anticipated in September 2026.
- The strategic policies establish a comprehensive framework that outlines how the Council, working alongside partners, will achieve the vision and objectives for development and transformation across the Borough through to 2043. These policies provide the foundation for coordinated efforts in managing growth, delivering essential services, and directing development to appropriate areas. They also set mechanisms for delivering infrastructure and ensuring the protection and enhancement of the built and natural environment, including safeguarding the Green Belt.
- Allocation policies specify the locations designated for development and change. To ensure that these developments align with the Plan's vision and objectives, criteria have been established for each site. These criteria define the types of development permitted, necessary mitigation measures, required infrastructure, and phasing to support sustainable and coordinated delivery.
- 7 Development management policies are applied during the

planning process to guide decisions on individual proposals, ensuring they support the broader vision and objectives outlined in the strategic policies. In line with the NPPF, the Castle Point Plan clearly identifies the strategic priorities for the Borough and the policies addressing them.

#### 3 The Legal Requirement for Sustainability Appraisal

- 8 This Sustainability Appraisal supports the Plan and is published and consulted upon simultaneously.
- 9 Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA) are essential processes rooted in both national and international commitments to advancing sustainable development. Sustainable development is widely understood through the 1987 definition by the World Trade Commission on Environmental Development, which describes it as: 'Development that meets the needs of the present without compromising the ability of future generations to meet their own needs'
- 10 SEA stems from the European Directive 2001/42/EC, known as the "SEA Directive", which was introduced in 2001. Its purpose is to enhance environmental protection, incorporate environmental considerations into the development and implantation of plans and programmes, and support the

- advancement of sustainable development. In England, the directive was implemented into law through the Environmental Assessment of Plans and Programmes Regulations (Commonly referred to as the SEA Regulations) in 2004. These regulations mandate that an SEA must be conducted for certain plans and programmes. This includes Local Plans. The aim of the SEA is to identify potentially significant environmental effects created as a result of the implementation of the plan or programme on issues such as: 'biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors' as specified in Annex 1(f) of the Directive.
- 11 SA evaluates the potential impacts of proposed plans and programmes across economic, social and environmental dimensions, aiming to advance sustainable development. For Local Plans, conducting an SA is required by paragraph 32 of the NPPF and legally enforced under the Planning and Compulsory Purchase Act 2004 (as amended by the Planning Act 2008).
- 12 Although the requirement for SA and SEA are distinct government guidance allows for a combination approach, provided the SEA Directive's requirements are fully addressed.

# 4 The Sustainability Appraisal: Structure, Role and Progress

- 13 This Report has been created to provide an overview of the sustainability strengths and potential weaknesses of the Plan's policies, including the reasonable alternatives that have been assessed so far. It addresses Stage C of the SA process, incorporating elements from Stage B, such as evaluating strategic options and reasonable alternatives, assessing their likely effects, and identifying methods to mitigate negative impacts while enhancing positive outcomes. The Report also serves to fulfill the SEA regulations in relation to the entire SA process.
- 14 The Sustainability Appraisal (Environmental) Report has been prepared to inform the Regulation 19 Local Plan consultation and to demonstrate that sustainability considerations have been central to the Council's decision-making process.
- 15 This report is accompanied by more detailed information in Appendices and Annexes, in the following structure:

#### **Main Document Sections**

- 1. Introduction
- 2. The SA Process so far

- 3. The Approach to Assessing the Plan
- 4. The Assessment of the Plan Policies, Strategy & Reasonable Alternative Options
- 5. The Assessment of Option Sites
- 6. Conclusions and Whole Plan Effects (Including Cumulative, Synergistic, Temporal and Transboundary Effects)
- 7. Next Steps
- 8. Monitoring
  - Appendix 1. SA Assessment Summaries by Local Plan Chapter (Alternative cumulative view)
  - Appendix 2. Plans Policies and Programmes
  - Appendix 3. SA Scoping Report Consultation Comments and Actions

#### **Annexes**

Annex A – Detailed Assessments of Option Site

A1. Tables

A2. Mapping

Annex B - Baseline Information

16 This SA Report is intended to be consulted upon alongside the Regulation 19 Proposed-Submission Plan. There are three statutory consultees or 'environmental authorities' that are required to be consulted for all Sustainability Appraisal and Strategic Environmental Assessment documents. These are:

- The Environment Agency;
- · Natural England; and
- Historic England.
- 17 The consultation will also aim to involve the broader community to ensure thorough public participation. Castle Point Borough Council may also choose to seek feedback from specific groups, key stakeholders, and other interested parties. The Council will finalise the consultation arrangements, and further details on how to participate, including deadlines, can be found on the Council's website.

#### Progress so far

- 18 In July 2024, the Council formally approved the initiation of a public consultation on the *Issues and Options Consultation Document (July 2024)* and associated materials, including the SA Scoping Report. The consultation on the Castle Point Plan Issues and Options, along with supporting documents, was conducted from July to September 2024.
- 19 The SA Scoping Report set the broad Framework and objectives for the CPBC Sustainability Appraisal process. It also undertook initial appraisal of broad strategic options for the plan and established the baseline assessment and relevant plans/policies and programmes.

#### **Baseline Summary**

20 The Scoping Report identified key baseline 'issues' that the Plan should ideally aim to address. This process, combined

- with an analysis of plans and programs relevant to Castle Point and the surrounding area, facilitated the development of several Sustainability Objectives and key questions or criteria to evaluate the Plan's content. The detailed baseline information profile of the Plan area (has been updated again in the main report.
- 21 The report highlights the key sustainability issues relevant to the Plan area and within the broader scope of the Plan. It also presents the condition of the environment if the Castle Point Plan were not implemented.

#### The Sustainability Framework and Objectives

- 22 The SA uses a Framework with 20 objectives to assess the environmental, social and economic context of the plan, as well as indicators that may apply to the assessment of policies and sites. These objectives correspond to the topics in the SEA Directive, and have been assessed as being broadly compatible with each other.
- 23 The objectives are:

#### **SA Objective**

- 1) To protect, conserve and enhance biodiversity (habitats, species, and ecosystems) and geodiversity within the Borough
- 2) To conserve and enhance water quality and resources, and ensure sustainable reuse of water
- 3) To maintain, conserve and enhance the quality and local distinctiveness of the Borough's landscape character and townscapes.

#### **SA Objective**

- 4)To protect, conserve and enhance land, soils and mineral resources, minimise the loss of agricultural land, whilst reducing land contamination
- 5) To contribute to the sustainable use of land
- 6) To maintain and enhance the Borough's cultural heritage assets and areas, assets of historical and archaeological importance and their settings.
- 7)To reduce contributions to climatic change by adapting and responding to the implications of a changing climate
- 8) To adapt and respond to reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.
- 9) To maintain and enhance air quality in the Borough, reducing contributions to climate change, and reduce noise pollution.
- 10) To reduce the need to travel and promote and encourage the use of sustainable and active alternative methods of travel to motorised vehicles to reduce road traffic congestion and mitigate air pollution
- 11) To improve the quality, range, and accessibility to essential services, facilities, green infrastructure and open space
- 12) To reduce levels of deprivation and disparity and social exclusion
- 13) To improve the population's health and reduce health inequalities.
- 14) To provide appropriate, affordable and decent housing and accommodation to meet existing and future needs of the whole community,
- 15) To promote the efficient use of resources and ensure the necessary infrastructure to support sustainable development
- 16) To improve the education and skills of the population
- 17)To ensure sustainable employment provision and economic growth by improving efficiency, competitiveness and adaptability of the local

#### **SA Objective**

economy and help people gain access to satisfying work appropriate to their skills, potential and place of residence

- 18) To maintain and enhance the vitality and viability of town and retail centres
- 19) To promote the sustainable management of waste
- 20) To ensure that the digital infrastructure available meets the needs of current and future generations
- 24 The intensity of impacts may differ depending on how closely the site or policy content aligns with specific sustainability objectives or themes. When policies are evaluated against the Sustainability Objectives, the rationale behind the judgments made in the assessment is outlined in the following key:

Possible impact	Basis for judgement
++	Significant positive impacts
+	Minor positive impacts
?	Possibility of either positive or negative impacts, or general uncertainty.
0	No impact or Neutral/Balanced Impacts
N/A	Not applicable to the scope or context of the appraised content
-	Minor negative impacts
	Significant negative impacts

25 Where applicable, 'combination' scoring has been used in the assessment. For example, question marks may be used in

combination with either positive or negative symbology, such as in circumstances where effects are less certain.

#### 5 The Sustainability Appraisal: Assessments

- 26 All plan policies and identified reasonable alternative options have been assessed in Chapter 4.
- 27 Whilst all plan policies are important, Policy SP3 'Meeting Development Needs' and its alternative options is perhaps particularly key to the Plan.
- 28 For 'Meeting development needs' Four broad cumulative options were identified: The four options assessed are considered to most helpfully broadly summarise the choices facing the Castle Point Plan.
  - Option 1 reflects both the plan policy position and also scenario 1 in the Infrastructure Delivery Plan (IDP)
  - Option 2 is sub-divided in to 2a and 2b, both involve releasing some larger greenfield sites selected from the reasonable options. Option 2a assumes a release of a small number (perhaps 5) of larger sites currently designated Green Belt, but identified as Grey Belt in the Green Belt Review. It broadly reflects scenario 2 in the IDP.
  - Option 2b assumes a larger number, (perhaps 10) green belt sites being released, including all those in scenario

2a plus additional Green Belt sites. It broadly reflects scenario 3 in the IDP.

- Option 2a envisages the inclusion of sites GB3, GB4, GB5, GB6 and GB12 as set out in IDP scenario 2. Option 2b includes the same sites as Option 2a with the addition of sites GB1,GB2, GB9, GB13 and N3, as set out in scenario 3 in the IDP.
- Option 3 stems from national Standard Method target, which now equates to 686 per annum from a total supply of 11,662 over the period 2026-2043. This doubled the previous equivalent figure (349 p/a) which was already considered unachievable, since the average annual housing addition over the previous 20 year plus period (2021 to 2024) was 101 (which was also a period of considerable development pressure).
- Option 3 has been included as an 'option' because it is the central government position, although in practical reality it doesn't represent a reasonable option since these numbers would not be remotely possible to achieve in the relatively urbanised Borough of 17 sq. miles with a prevailing low-mid density residential character, a plethora of environmental constraint and a high proportion of Green Belt which mostly meets at least one of the national green belt purposes to a strong degree. The overall 'significant negative' SA reflects this.

- As set out in more detail in the main report, each option would see progressively more serious negative impacts upon SA objectives 1, 2, 3,4, 5, 6, 7, 8, 9, 10, 11, 13 and 15 in particular. Several of these negative effects could not be mitigated. However, there are positive impacts against objective 14, and 12 to a lesser extent.
- 29 Reference to chapter 4 should be made for the assessment of other policies and reasonable alternatives.
- 30 A comprehensive assessment of all reasonable option sites is set out in Annex A, with the accompanying explanation of their indicators set out in Chapter 5 according to each of the 20 SA objectives.
- 31 The main Green Belt site options and clusters are also assessed in section 5.21 and sites submitted for Biodiversity Net Gain /Natural environment sites are assessed in 5.22.
- 32 Chapter 6 considers whole Plan Effects (Including Cumulative, Synergistic, Temporal and Transboundary Effects) for each of the 20 SA objectives. Effects for objectives 1 and 8 are mixed against the plan policies. Effects for objectives 2, 9 and 19 are predominantly negative against the plan policies. Effects for objectives 3, 4, 6, 7, 13, 14, 16, 17, 18 and 20 lean positive against the plan policies. Effects for objectives 3, 5, 10, 11, 12 and 15 are generally strongly positive against the plan policies.

#### 6 Next Steps

- 33 This SA (including Annexes) will be subject to consultation. There are three statutory consultees that are required to be consulted for all Sustainability Appraisal and Strategic Environmental Assessment documents. These are:
  - The Environment Agency;
  - Natural England; and
  - Historic England.
- 34 In addition to these, consultation will seek to engage the wider community in order to encompass comprehensive public engagement. The Borough Council are additionally required to invite comments from focused groups, relevant stakeholders and interested parties in accordance with their Statement of Community Involvement (SCI).
- 35 Upon adoption Local Plans will be accompanied by an Adoption Statement which will outline those monitoring indicators most appropriate for future monitoring of the Plan in line with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004.